

DONNELLY, J.

BLOOM, M.J.

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

 ORIGINAL

Kristine Arutyunyan

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

-against-

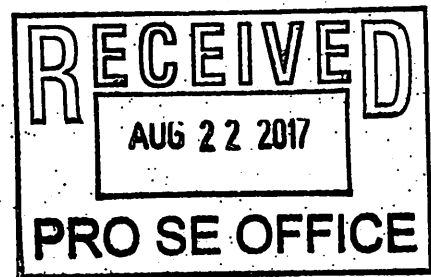
Federal Bureau of  
Investigation of New  
York State

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

Complaint for a Civil Case

Case No. **CV 17-5009**  
*(to be filled in by the Clerk's Office)*

Jury Trial: ☒ Yes ☐ No  
*(check one)*



**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Kristine Arutyunyan</u>
Street Address	<u>82 Wheeler Avenue</u>
City and County	<u>Staten Island, Richmond</u>
State and Zip Code	<u>New York, 10314</u>
Telephone Number	<u>929-393-9383</u>
E-mail Address	<u>kristine.arutyunyan@gmail.com</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	<u>Federal Bureau of</u>
Job or Title (if known)	<u>Investigation of New</u>
Street Address	<u>York State</u>
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

**Defendant No. 2**

Name	
Job or Title (if known)	
Street Address	
City and County	

State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

Defendant No. 3

Name \_\_\_\_\_  
Job or Title \_\_\_\_\_  
(if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_  
Job or Title \_\_\_\_\_  
(if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Violation of Federal civil rights statutes  
violation of my civil rights, civil liberties,  
violation of human rights, privacy act

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

**1. The Plaintiff(s)**

**a. If the plaintiff is an individual**

The plaintiff, (name) Kristine Arutyunyan citizen of  
the State of (name) Russian Citizen

**b. If the plaintiff is a corporation**

The plaintiff, (name) \_\_\_\_\_, is incorporated  
under the laws of the State of (name) \_\_\_\_\_,  
and has its principal place of business in the State of (name) \_\_\_\_\_

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)**

**a. If the defendant is an individual**

The defendant, (name) \_\_\_\_\_, is a citizen of  
the State of (name) \_\_\_\_\_. Or is a citizen of  
(foreign nation) \_\_\_\_\_

b. If the defendant is a corporation

The defendant, (name) FBI, is  
incorporated under the laws of the State of (name)  
New York, and has its principal place of  
business in the State of (name) \_\_\_\_\_. Or is  
incorporated under the laws of (foreign nation)  
\_\_\_\_\_, and has its principal place of  
business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an  
additional page providing the same information for each additional  
defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant  
owes or the amount at stake—is more than \$75,000, not counting interest  
and costs of court, because (explain):

all emotional, mental, physical and  
health damages caused to me; months  
and years spent apart from my family  
overseas can not be fully recovered

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as  
briefly as possible the facts showing that each plaintiff is entitled to the damages or other  
relief sought. State how each defendant was involved and what each defendant did that  
caused the plaintiff harm or violated the plaintiff's rights, including the dates and places  
of that involvement or conduct. If more than one claim is asserted, number each claim  
and write a short and plain statement of each claim in a separate paragraph. Attach  
additional pages if needed.

Since my first days of arrival to the U.S. in  
October 2007 I am a target of FBI of NYS.  
Being under 24/7 surveillance and watch I  
am not able to obtain human life, live sustainable,  
happy, healthy life. That effected my legal status

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iii. Statement of Claim

in the country, my employment, my professional life as a future lawyer; it violated my privacy; having access to information that is only available to me personally and my family while communicating via emails, phone calls (regular phone, Facebook messenger, skype, WhatsApp). It damaged my relationship with my family, caused me emotional, health problems and damages

**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Being a target of FBI of NYS I am lacked all opportunities that I sought, found and tried to pursue to have a legitimate life, legal status in the U.S, apply for law school, have my dream job as a lawyer,

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.


**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 08/22, 2017

Signature of Plaintiff

Printed Name of Plaintiff

  
Kristine Arutyunyan

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12 Relief

have a sustainable job to provide myself with basic needs; opportunity to visit my family overseas. I am lacked to provide myself with basic human needs such as food, clothes, personal hygiene products, medical assistance, legal aid to adjust my legal status in the U.S.

All these years of emotional, mental and physical harassment by FBI agents of NYS put me in a very poor emotional state of mind and very poor physical health state that can not be fully recovered. All these years I lacked personal happiness to have a family, have husband, children and feel the greatness and beauty of family life. These opportunities are gone forever and I can not bring back the time. For such and much more reasons, I am seeking financial remedy of \$10,000,000. / ten million dollars / for lost emotional and physical health, life opportunities and lost years in struggle and humiliation; financial and emotional damages that are caused to me and my family.